STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

Commonwealth Edison Company

Approval of Energy Efficiency and Demand Response Plan Pursuant to Section 12-103(f)

C41 - Data in Fursiant to Section 12

of the Public Utilities Act

No. 07-0540

PETITION FOR LEAVE TO INTERVENE

COME NOW Abbott Laboratories, Inc; Caterpillar Inc; Ford Motor Company; and Enbridge Energy, LLP, and in support of their Petition for Leave to Intervene in the above entitled matter states as follows:

- 1. That Petitioners are authorized to do business in the State of Illinois and operate manufacturing plants in the State of Illinois.
- 2. That Petitioners are substantial users of electricity within the Commonwealth Edison Company service territory.
- 3. That Petitioners will be substantially affected by any decision of the Illinois Commerce Commission in the above entitled docket.

WHEREFORE, Petitioners herewith pray they be granted leave to intervene, and become parties to the above styled proceeding known as the Illinois Industrial Energy Consumers ("IIEC") group for the purpose of producing evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before this Commission, should oral argument be granted.

DATED this 20th day of November, 2007.

Abbott Laboratories, Inc;

Caterpillar Inc;

Ford Motor Company; and

Enbridge Energy LLP

BY:

Eric Robertson Ryan Robertson

Lueders, Robertson & Konzen LLC

P. O. Box 735

Granite City, IL 62040

618-876-8500

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ryrobertson@lrklaw.com

STATE OF ILLINOIS

: SS

COUNTY OF MADISON

VERIFICATION

Eric Robertson, being first duly sworn, deposes and says that he is one of the practicing attorneys in the firm of Lueders, Robertson & Konzen, LLC and one of the attorneys for Abbott Laboratories, Inc; Caterpillar Inc; Ford Motor Company; and Enbridge Energy, LLP, and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above and foregoing document, has knowledge of the facts stated therein and herewith states that the matters set forth therein are true in substance and in fact.

Eric Robertson

Lueders, Robertson & Konzen LLC

1939 Delmar Avenue

P. O. Box 735

Granite City, IL 62040

618-876-8500

erobertson@lrklaw.com

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 20 day of November, 2007.

NOTARY PUBLIC

"OFFICIAL SEAL"
BARBARA BRANDT
NOTARY PUBLIC—STATE OF ILLINOIS
MY COMMISSION EXPIRES JULY 7, 2011

PROOF OF SERVICE

STATE OF ILLINOIS

SS

COUNTY OF MADISON

I, Eric Robertson, being an attorney admitted to practice in the State of Illinois and one of the attorneys for Illinois Cement Company, et al., herewith certify that I did on the 13th day of November, 2007, electronically file with the Illinois Commerce Commission, a Petition for Leave to Intervene on behalf of Abbott Laboratories, Inc; Caterpillar Inc; Ford Motor Company; and Enbridge Energy, LLP, and electronically served same upon the persons identified on the Commission's official service list.

Eric Robertson

Lueders, Robertson & Konzen

1939 Delmar Avenue

P. O. Box 735

Granite City, IL 62040

(618) 876-8500

SUBSCRIBED AND SWORN to me, a Notary Public, on this 20 day of November, 2007.

Notary Public

61784

"OFFICIAL SEAL"
BARBARA BRANDT
NOTARY PUBLIC—STATE OF ILLINOIS
MY COMMISSION EXPIRES JULY 7, 2011